

# EXHIBIT B



**INDEX IN SUPPORT OF MOTION TO SEAL**

<b>Material/Title of Document</b>	<b>Basis for Sealing (Legitimate Private or Public Interest Which Warrant the Relief Sought)</b>	<b>Clearly Defined and Serious Injury that Would Result if Relief is Not Granted</b>	<b>Why a Less Restrictive Alternative to the Relief Sought is Not Available</b>	<b>Any Prior Order Sealing the Same Materials in the Pending Action</b>	<b>Party in Opposition to Sealing, if any, and Basis</b>
Redactions on page 9 (“JJHCS . . . SaveOnSP”), and on page 25 (“The . . . plan,” “The . . . 2022,” and “The . . . 2020”) of the August 24 lead letter (ECF No. 146; the “August 24 Letter”): Discussion of confidential benefits investigations; and  Exhibits 11-13: Benefits Investigation Updates.	JJHCS requests the sealing of confidential benefits investigations updates and related discussions in the August 24 Letter. These materials contain confidential information that is not known to the general public and for which the parties agreed to keep confidential, including materials designated as Confidential Health Information. JJHCS maintains that these exhibits and discussion thereof contain sensitive business and personal health information.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information and confidential health information.  Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information and would allow Confidential Health Information to be improperly revealed to the public.	JJHCS requests redactions of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.



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<p>Redactions on page 9 of the August 24 Letter (“program . . . formats”);</p> <p>Exhibit 14: Business Rules; and</p> <p>Exhibit 15: Call Guide.</p>	<p>JJHCS requests the sealing of two documents and related discussions in the August 24 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these exhibits contain sensitive business information, including the application of the CarePath program.</p>	<p>If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.</p> <p>Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.</p>	<p>JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.</p>	<p>None.</p>	<p>None.</p>
<p>Redactions on page 9 of the August 24 Letter (“explaining . . .”); and</p> <p>Exhibit 16: emails.</p>	<p>JJHCS requests the sealing of emails and related discussions in the August 24 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this exhibit</p>	<p>If filed on the public docket, this exhibit and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.</p>	<p>JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.</p>	<p>None.</p>	<p>None.</p>



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	contains sensitive business information, including the application of the CarePath program.	Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Redactions on page 12 of the August 24 Letter (“it . . . Drugs,” and “contemplating . . .”); and Exhibit 17: draft terms and conditions document.	JJHCS requests the sealing of a document and related discussions in the August 24 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this exhibit contains sensitive business information, including the application of the CarePath program.	If filed on the public docket, this exhibit and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.  Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.



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		competitors secured the information.			
Redactions on page 12 (“setting . . . format” and “. . . benefit”); and Exhibit 18: email.	JJHCS requests the sealing of an email and related discussions in the August 24 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this exhibit contains sensitive business information, including the application of the CarePath program.	If filed on the public docket, this exhibit and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.  Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.



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Redactions on page 12 of the August 24 Letter (“copied . . .”); and Exhibit 19: email.	JJHCS requests the sealing of an email and related discussions in the August 24 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this exhibit contains sensitive business information, including the application of the CarePath program.	If filed on the public docket, this exhibit and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.  Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.
Redactions on page 13 n.7 (“a . . . Specialist,” “presentation . . .,” and “Alerting . . .”), and page 26 (“ . . . Program,” “approximately . . . programs,” “[t]he . . . patients,” and “. . .	JJHCS requests the sealing of a training presentation and related discussions in the August 24 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS	If filed on the public docket, this exhibit and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.



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patients”) of the August 24 Letter; and  Exhibit 21: training presentation.	maintains that this exhibit contains sensitive business information, including the application of the CarePath program.	Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Redactions on page 13 n.7 (“Field . . . change” and “contains . . .”), and on page 26 (“May . . . Program” and “Janssen . . . plan.”) of the August 24 Letter; and  Exhibits 22 and 23: training materials.	JJHCS requests the sealing of training materials and related discussions in the August 24 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these exhibits contain sensitive business information, including the application of the CarePath program.	If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.  Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.



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<p>Redactions on page 13 of the August 24 Letter (“simply . . . rules,” “patient . . .,” “work . . .,” and “Janssen . . . Rules”);</p> <p>Exhibit 24: template letter;</p> <p>Exhibit 25: work order; and</p> <p>Exhibit 26: Business Rules.</p>	<p>JJHCS requests the sealing of documents and related discussions in the August 24 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these exhibits contain sensitive business information, including the application of the CarePath program.</p>	<p>If filed on the public docket, these exhibits and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.</p> <p>Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.</p>	<p>JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.</p>	<p>None.</p>	<p>None.</p>



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Redactions on page 25 of the August 24 Letter (“her . . . Complaint”); and  Exhibit 20: JJHCS’s Responses and Objection to SaveOnSP’s First Set of Interrogatories.	JJHCS requests the sealing of interrogatory responses and related discussions in the August 24 Letter that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this exhibit contains sensitive business information, including the development of the CarePath program.	If filed on the public docket, this exhibit and related discussion will reveal confidential material relating to JJHCS’s sensitive business information.  Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.
Exhibit 1 to the August 24 Letter: Exemplar CarePath terms and conditions.	JJHCS requests the sealing of a document that is not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this exhibit contains sensitive business information,	If filed on the public docket, this exhibit will reveal confidential material relating to JJHCS’s sensitive business information.  Disclosure of this confidential and proprietary information to	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.



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	including the application of the CarePath program.	the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Redactions on Exhibit 2, discovery letter, dated May 17, 2023: page 3 (“about . . . production”), page 5 (“Jennifer . . . ,”) and (“ . . . 2021), page 6 (“reflecting . . . version”), and page 8 (“played . . . and conditions”).	JJHCS requests the sealing of a document referencing confidential materials that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this exhibit contains sensitive business information, including the application of the CarePath program.	<p>If filed on the public docket, this exhibit will reveal confidential material relating to JJHCS’s sensitive business information.</p> <p>Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.</p>	JJHCS is submitting a redacted version of this exhibit and requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.



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Redactions on Exhibit 8, discovery letter, dated July 24, 2023: page 3 (“such . . . 00293776”), page 5 (“None . . . T&Cs”), page 5 n.1 (“The . . . made”), and page 6 (“including . . . T&Cs” and “as . . .”).	JJHCS requests the sealing of a document referencing confidential materials that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this exhibit contains sensitive business information, including the application of the CarePath program.	If filed on the public docket, this exhibit will reveal confidential material relating to JJHCS’s sensitive business information.  Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS is submitting a redacted version of this exhibit and requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.
Redactions on Exhibit 30, discovery letter, dated June 12, 2023 (“form . . . plans.”)	JJHCS requests the sealing of a document referencing confidential materials that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this exhibit contains sensitive business information, including the	If filed on the public docket, this exhibit will reveal confidential material relating to JJHCS’s sensitive business information.  Disclosure of this confidential and proprietary information to the public would cause	JJHCS is submitting a redacted version of this exhibit and requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.



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	application of the CarePath program.	irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Exhibits 27 and 28 to the August 24 Letter: letter templates to patients.	JJHCS requests the sealing of letter templates to patients that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that these exhibits contain sensitive business information, including the application of certain terms of the CarePath program.	<p>If filed on the public docket, these exhibits will reveal confidential material relating to JJHCS's sensitive business information.</p> <p>Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.